



**Craig A. Rogerson**  
*Chairman, President & CEO*

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December 17, 2009

Lisa P. Jackson, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (1101A)  
Washington, D.C. 20460

**Re: DecaBDE Phase-Out Initiative**

Dear Administrator Jackson:

Chemtura Corporation is pleased to join the DecaBDE Phase-Out Initiative. We have worked closely with your staff to help design the Initiative. We welcome the opportunity to help transition customers from decabromodiphenyl ether (decaBDE) to other alternatives.

This Initiative continues Chemtura's long-standing efforts with regard to protecting people and property from the hazards of fire in a sustainable manner. In 2003, Chemtura's predecessor company, Great Lakes Chemical Corporation, announced that by the end of 2004 it would have voluntarily phased out all production of two other flame retardants that were widely used at the time, pentabromodiphenyl ether (pentaBDE) and octabromodiphenyl ether (octaBDE). The EPA commended Great Lakes for taking that action voluntarily and for doing so as expeditiously as possible.

Since then, Chemtura (formed in 2005 from the joining together of Great Lakes Chemical Corporation and Crompton Corporation) has responded to the needs of our customers and concerns of other key stakeholders to introduce more sustainable flame retardants. We have sponsored or co-sponsored extensive health and environmental studies of various flame retardants. Chemtura offers a broad portfolio of flame retardants used in a wide variety of applications. We continually strive to bring new high performance and greener products to market.

Chemtura will submit a detailed plan of year-over-year reductions in decaBDE production to the EPA. Chemtura commits to a complete phase-out of decaBDE production by the end of 2012 (except for certain uses discussed below). We will not stockpile inventories for future sale, and any inventory remaining will be sold no later than six months after the end of the phase-out period.

The phase-out will focus initially on consumer applications such as electronics and home furnishings, followed by all other applications. Due to the stringent engineering requirements and risks associated with product changes in certain transportation and military applications, multiple levels of testing and certification are typically required. We expect that some of these uses may require up to 12 additional months to verify that alternatives provide an acceptable level of performance and fire safety. To the extent we are legally permitted, we will notify the EPA of any uses which require an extended time to phase out decaBDE.

Based on these commitments, Chemtura commits to the following phase-out schedule:

By Dec. 31, 2012: Discontinue production and sale of decaBDE for all applications except for certain transportation or military applications.

By Dec. 31, 2013: Discontinue production of decaBDE for any remaining applications.

By six months after  
end of phase-out: Complete liquidation of any residual inventory of decaBDE.

Chemtura will work closely with its customers to help transition them to alternatives. We will report annually on our progress, including the percentage decline in production and sales from the 2008 baseline, and will inform the EPA when we have completed our phase-out. EPA contractors may obtain access to our reports subject to appropriate restrictions on disclosure of confidential information.

We look forward to working with the EPA on this Initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Rogerson', with a stylized flourish at the end.

Craig A. Rogerson  
Chairman, President & CEO

cc: Stephen A. Owens  
Assistant Administrator for Pollution Prevention and Toxics  
U.S. EPA Office of Pollution Prevention and Toxics  
1200 Pennsylvania Avenue, NW (7401M)  
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Wendy Cleland-Hamnet, Director  
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